

DRAFT
JUNE 1998
APPENDIX # 1

LETTERS SUBMITTED BY STATE AGENCIES

37-29



Air Resources Board



Pete Wil
Governor

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John D. Dunlap, III, Chairman
P.O. Box 2815 · 2020 L Street · Sacramento, California 95812 · www.arb.ca.gov

April 14, 1998

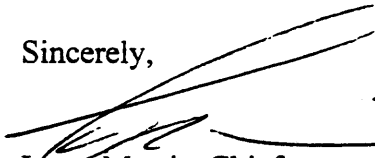
Mr. Jerry Hart
CIWMB
Organics & Resource Efficiency Branch
8800 Cal Center Drive
Sacramento, CA 95826

Dear Mr. Hart:

Attached you will find a 3.5" diskette prepared in Word 97. On this disk are comments to your letter dated March 26, 1998 on Recycled Product Procurement.

If you have any questions, please contact Mr. Gary Oliphant at (916) 322-2249.

Sincerely,


Larry Morris, Chief
Administrative Services Division

37-30

BUY RECYCLED PROCUREMENT POLICY

PURPOSE

To increase the recycled content of products purchased and used by the Air Resources Board.

To increase demand for recycled products thereby enhancing markets for recycled materials.

To reduce waste in the manufacture and use of products and packaging purchased by the Air Resources Board.

To reduce the amount of toxic chemicals purchased by the Air Resources Board to limit environmental hazards, employee exposure to such materials, and cost of proper disposal of residual material.

To provide guidance to Air Resources Board staff in evaluating the purchase of products for the Air Resources Board.

GENERAL POLICY

- It is the policy of the Air Resources Board to optimize the departmental procurement of recycled content products. Fitness and quality being equal, the Board shall buy recycled content products whenever the cost is the same or lower than non-recycled content products.
- Board publications shall be printed on recycled content papers and /or recyclable papers.
- The Board shall apply approved price preferences to all purchases of recycled content products when they compete with non-recycled products.
- The Board shall purchase goods which may be recycled or reused rather than discarded.
- The Board shall strive to attain the following AB 11 purchase goals.
- The Board shall maintain an on going relationship with Green Seal Environmental Partners Program and continue to receive product updates.

AB 11 RECYCLED CONTENT PRODUCT BUYING GOALS			
	Current Goal	1997	1998
Paper Products	40% of \$ spent	50% of \$ spent	50%
Fine Printing and Writing Paper	15% of reams bought	25% of reams bought	25%
Overall Purchase goals	N/A	20% of \$ spent	30%

AUTHORITY

- Public Contract Code Sections 12162, 12205, 12159 and 12305.5

PURCHASE RESTRICTIONS, SPECIFICATIONS AND BID SOLICITATIONS

- Purchases or rentals by the Air Resource Board shall be compatible, whenever practical, with the use of recycled content products.
- Specifications and requisitions shall not require, unless justified, the use of products made from virgin materials, nor specifically exclude the use of recycled content products.
- Performance standards must be reasonable and related to the function, and shall not be designed to exclude the purchase of recycled content products.
- Department staff shall purchase (and return for recycling) remanufactured cartridges, where available, for printers and photocopying machines.

MONITORING AND ANNUAL REPORT

- The Recycled Content Products Procurement Coordinator will include in the Annual report to the Integrated Waste Management Board an update on the status of the policy's implementation including a summary of recycled content products used by and available to the Air Resources Board.

PROCUREMENT AND SOURCE REDUCTION EXAMPLES

- Purchase copiers that make double-sided copies and use recycled content paper.
- Purchase recycled laser toner cartridges and return used ones for recycling.
- Purchase of office supplies which contain recycled content material, including wastebaskets, pens/pencils, and desk supplies.
- Implement and maintain a recycling program for white paper, newsprint, magazines, and cardboard. Cardboard boxes and manila envelopes will be reused whenever possible otherwise cardboard will be bundled for recycling.
- Reference Green Seal's website **www.greenseal.org** for the most current updates of recycled products available.

RECYCLED PRODUCT PRICE PREFERENCE

Preference Percentage	Product	Minimum Content	Purchasing Goals	Sunset
5	Tire derived rubber product	(50 PC)	20% in 1997 30% in 1998	None
5	Refined automotive lubricants	(70)	20% in 1997 30% in 1998	1/1/97
5	Recycled solvents	(70)	20% in 1997 30% in 1998	1/1/97
5	Paper janitorial supplies	(50)	40% in 1997 50% in 1998	1/1/2001
10	Paper, fine printing & writing, sold in reams	(20 PC)	15% of reams in 1997 25% of reams in 1998	1/1/2001
10	Paper, non-janitorial, not sold in reams, excluding newsprint	(50/20)	40% in 1997 50% in 1998	1/1/2001
10	Plastic products excluding trash bags & rigid plastic containers	(50)	20% in 1997 30% in 1998	1/1/2001
0	Glass products	(10)	20% in 1997 30% in 1998	1/1/2001

STATE OF CALIFORNIA — THE RESOURCES AGENCY

PETE WILSON, Governor

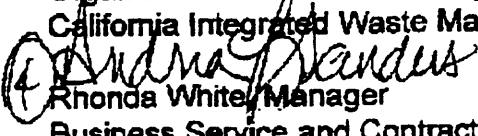
CALIFORNIA CONSERVATION CORPS

Financial Management Branch

1719 24th Street, Sacramento, CA 95816
(916) 341-3132

MEMORANDUM

TO: Jerry Hart
Organics & Resource Efficiency Branch
California Integrated Waste Management Board

FROM:  Rhonda White, Manager
Business Service and Contract Branch

DATE: May 4, 1998

SUBJECT: Recommendations to Increase Recycled Product Procurement

This memo is in response to the California Environmental Protection Agency (Cal/EPA) memo dated March 26, 1998, requesting input into the development of recommendations to increase recycled product procurement to be included in a report to the Legislature.

The California Conservation Corps (CCC) staff have been fully trained and made aware of the mandate to purchase recycled products and welcome the opportunity to aid in the development of the recycled product process.

In response to item #1 of your memo, the CCC implemented a Recycled-Content Product (RCP)/Non-RCPs tracking system to track our efforts towards reaching the procurement goals.

Reportable information is difficult to obtain after purchasing and distribution has been completed. To provide CIWMB with an actual RCP procurement report of all reportable purchases, a self-inking rubber stamp containing the 11 reportable categories was designed and distributed to our 14 Districts/Divisions and one to the Headquarter's Procurement Officer. Documentation is then forwarded to our Headquarter's Business Services and Contracts Branch. Information is then totaled and transferred to the RCP Procurement Report due annually in September.

In response to item #3 of your memo, the CCC suggests the following recommendations:

- Identification of suppliers of post-consumer recycled clothing items.

The Mission of the California Conservation Corps is to provide meaningful work and educational opportunities to assist young men and women in becoming more employable, while protecting and enhancing California's environment, human resources and communities.

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Hart
May 4, 1998
Page Two

- Specify post-consumer recycled materials for flooring, roofing, framing and other possible construction use. (e.g., for decking, there is a post-consumer recycled plastic product call TREX which has as much or more structural integrity as wood).
- A Public Relations campaign focused on "closing the loop" (with paper and plastic) should make state employees more aware of and prouder of their role in recycling and in reuse of recycled materials.

Thank you for the opportunity to express our recommendations. If you have any questions, please call me at (916) 341-3132 or Andrea Sanders at (916) 341-3242.

RW:AS

cc: Al Aramburu
Kären Dickerson

April 22, 1998

Mr. Jerry Hart
CIWMB
Organics & Resource Efficiency Branch
8800 Cal Center Drive
Sacramento, CA 95826

This is in response to Caren Trgovcich's request for recommendations to increase the use of recycled products.

Cal Expo uses recycled products whenever feasible and the cost is competitive with non-recycled products. Cal Expo could possibly increase its use if it was provided with a catalog of recycled materials and products available, along with a list of dealers and distributors.

Please contact me at (916) 263-3075 or Steve Launey at (916) 263-3773 if you need additional information.

CALIFORNIA EXPOSITION & STATE FAIR
Brian A. May
Assistant General Manager, Operations

cc: Steve Launey

37-36

CALIFORNIA HORSE RACING BOARD



Memorandum

Date : May 5, 1998

To : Jerry Hart
CIWMB
Organics & Resources Efficiency Branch
8800 Cal Center Drive
Sacramento, California 95826

From : Roy C. Wood, Jr.
Executive Director

Subject : RECYCLED PRODUCT PROCUREMENT

This is in response to Caren Trgovcich's letter dated March 26, 1998, in which she requested this agency provide input relating to increasing recycled product procurements. As suggested by Ms. Trgovcich, our comments are directed primarily toward the letter's "third item".

The California Horse Racing Board (CHRB) is very supportive of the state's recycled product purchase program and is very proactive in the purchasing of recycled products. In 1996-97, 58% of the office products purchased were of recycled materials. Regarding steps state agencies can take to increase their use of recycled products, one suggestion is for the Prison Industry Authority (PIA) to maximize the amount of recycled material it uses to manufacture the products it sells to state agencies, e.g., office furniture. Another suggestion is for the CIWMB to continue increasing the recycled purchase mandates placed on state agencies.

In closing, the CHRB feels its recycled product procurement program is working very well and that the state's regulations and procedures utilized by our procurement staff are relatively straightforward and easy to follow. Additionally, it appears there are ample recycled office products available on the market so that the CHRB can annually meet its recycled product procurement purchase goals.

Thank you for asking this agency to comment on this matter.

Please feel free to contact Paige Noble, Chief of Administration, at (916) 263-6037 if you have any questions or require additional information.

1010 Hurley Way, Suite 300, Sacramento, CA 95825

Phone: (916) 263-6000 FAX: (916) 263-6042

37-37

CALIFORNIA
PER
Memorandum

Date: April 23, 1998

California Public Employees' Retirement System

To: Jerry Hart
CIWMB
Organics & Resource Efficiency Branch
8800 Cal Center Drive
Sacramento, California 95826

From: Operations Support Services Division
Lincoln Plaza, 400 P Street
Sacramento, CA 95814

Subject: CALIFORNIA INTEGRATED WASTE MANAGMEENT BOARD'S
REQUEST FOR SUGGESTIONS

At this time, the California Public Employees' Retirement System (CalPERS) does not have any suggestions to offer to increase recycled product procurement. The data we collect under the current reporting system has not provided us with any opportunities for improvement.

Although we have no suggestions to offer, CalPERS will continue its attempt to meet the requirements set forth by the California Integrated Waste Management Board. If you have any questions or require additional information, please contact Sharon Garrett, 326-3366.


Michael W. Koester, Chief
Operations Support Services Division

cc: Vincent P. Brown

COMMISSION ON PEACE OFFICER STANDARDS AND TRAINING

1601 ALHAMBRA BOULEVARD
SACRAMENTO, CA 95816-7083

(916) 227-3909
FAX (916) 227-3895
www.post.ca.gov

April 20, 1998

Jerry Hart

CIWMB, Organics & Resource Efficiency
8800 Cal Center Drive
Sacramento, CA 95826



Dear Mr. Hart:

The Commission on Peace Officer Standards and Training (POST) is very supportive of the State's policies regarding recycled product procurement. Though this frequently results in added costs in purchasing a recycled product versus the virgin product, POST staff makes every effort to meet our recycled products procurement goals.

In response to your request, the following are POST's comments to the third item in your March 26, 1998 memo:

1. At State Procurement Conferences, more emphasis should be placed on recycled product procurement.
2. There should be a way for State agencies to network and share information on new recycled products and product sources. Quarterly meetings chaired by DGS, Procurement, or the CIWMB?
3. Agencies should decrease the quantity in their publication orders in reproduction areas in order to lessen the possibility of unusable information.
4. Transmit more information via the Internet, diskette, or E-mail rather than paper. A good example is this reply which could just as easily have been seen via E-mail.
5. Within departments, share information rather than make unnecessary copies by using internal route slips.
6. Make two-sided copies when xeroxing.

Should you have any questions, please feel free to contact Kirshyln Conway, POST's Business Services Officer, at (916) 227-3937.

Sincerely,


KENNETH O'BIREN
Executive Director

37-39

DEPARTMENT OF AGING

1600 K STREET

SACRAMENTO, CA 95814

Internet Home Page www.aging.state.ca.us

TDD Only 1-800-735-2929

FAX Only (916) 327-3661

(916) 322-3575



April 28, 1998

Jerry Hart
California Integrated Waste
Management Board
Organics & Resource Efficiency Branch
8800 Cal Center Drive
Sacramento, California 95826

Dear Mr. Hart:

In response to Caren Trgovcich's letter dated March 26, 1998, concerning recycled product procurement, the Department of Aging procures most products from Office Depot.

The purchasing staff routinely looks to see if items requested from the Office Depot catalog are made of recycled material. If an item is not, alternatives are sought within this same catalog and other vendor catalogs. There are many instances when a similar recycled product is available from vendors outside of the Office Depot contract. Always, the recycled products found outside of the Office Depot catalog are more costly; usually more than the 5% - 10% price preference suggested in the Public Contract Code. Prices for products available under the Office Depot contract are significantly lower than for the same/similar items found from other vendors. Applying the 5% - 10% price preferences is not successful in this situation. Perhaps if Office Depot were encouraged to offer more items made of recycled material than it does currently, the cost of those items would also be reduced.

We suggest that all vendors awarded a State contract be encouraged to offer recycled products whenever applicable. The State could provide an incentive to vendors offering recycled products. This might result in an increase of procurement in the recycled market.

If you have any questions, please contact Ms. Chris O'Keeffe, Business Services Assistant, at (916) 322-3575.

Sincerely,


DIXON ARNETT
Director

cc: Caren Trgovcich, Deputy Director
Waste Management and Market Development

37-40

DEPARTMENT OF ALCOHOL & DRUG PROGRAMS

1700 K Street
Sacramento, CA 95814
TTY (916) 445-1942
(916) 445-2065



May 4, 1998

Jerry Hart
CIWMB
Organics & Resource Efficiency Branch
880 Cal Center Drive
Sacramento, CA 95826

Dear Mr. Hart

In a letter dated March 26, 1998, a request was made that the Department of Alcohol and Drug Programs (ADP) assist your office in developing recommendations to increase recycled product procurement by state agencies.

ADP currently has a recycling program in effect as required by the Governor's Executive Order W-7-91. The Department's goals are to expend, at minimum, 30 percent of the total dollars spent on reportable purchases on recycled-content products. In addition, 50 percent of the total dollar amount spent on reportable paper products are of recycled-content and 25 percent of the total reportable fine printing and writing paper purchased are of recycled-content.

ADP annually reviews the above referenced goals and its purchasing practices, in an effort to identify ways to increase our recycled purchasing participation. In FY 1997-98, the Department is on track with meeting these recycling goals. We feel that if recycle products remain competitive in pricing and availability, each department should give priority in purchasing recycled products. If you have any further questions, please contact Janet Rice, Manager for Fiscal and Administrative Services Branch, at (916) 322-2298.

Sincerely,

A handwritten signature in cursive script that reads "Desirée Wilson".

Desirée Wilson, Deputy Director
Division of Administration

cc: Janet Rice, Manager
Caren Trgovcich, Deputy Director
Waste Prevention & Market Development

37-41

M e m o r a n d u m

Date:

To: Jerry Hart
California Integrated Waste Management Board (CIWMB)
Organics & Resource Efficiency Branch
8800 Cal Center Drive
Sacramento, CA 95826

From: **DEPARTMENT OF CALIFORNIA HIGHWAY PATROL**
Office of the Commissioner

File No.: 1.A8553


Subject: INFORMATION FOR INCLUSION IN A REPORT TO THE LEGISLATURE

The information provided below is in response to a March 26, 1998, letter from Ms. Caren Trgovcich regarding our efforts to purchase recycled materials, supplies, and equipment.

The California Highway Patrol (CHP) currently has no formalized written policies or procedures for acquiring recycled products; however, our Purchasing Services Unit (PSU) continually strives to identify suitable commodities made of recycled material. This is achieved by: (1) including language in bid solicitations requesting quotations on recycled products; (2) ensuring that a majority of office supplies purchased through the Office Depot contract be made of recycled content material, e.g., remanufactured laser printer toner cartridges; (3) targeting the acquisition of promotional items such as key tags and pens to achieve our buy recycled goal; and (4) utilizing the wooden pallet contract for the purchase of recycled pallets. Most recently, staff of PSU met with staff of the Department of General Services, Procurement Division, and a manufacturer of recycled rubber floor mats. The CHP is currently evaluating this product for possible future purchase.

In an April 17, 1996, letter, we advised Mr. Daniel Pennington from CIWMB that we hoped to develop an automated system to track the acquisition of recycled material, commodities, and equipment. To date, this goal has not been achieved, and information for yearly reports to CIWMB is gathered manually. My letter requested assistance from CIWMB to identify successful programs in other state agencies that we might adopt. We would still welcome such support.

Should you have any questions regarding this matter, please contact Mrs. Phyllis Angell at (916) 375-2989.


D. O. HELMICK
Commissioner

37-42

Memorandum

To: Jerry Hart
Organics and Resource Efficiency Branch
California Integrated Waste Management Board

Date: April 21, 1998

From: Department of Conservation -- Division of Recycling

Subject: Recycled Product Procurement By State Agencies

The Department of Conservation (Department) is pleased to contribute ideas on ways to increase recycled content product procurement by state agencies. As you know, the success of recycling as an effective waste management strategy depends on consistent markets for recycled materials. The State of California's buy-recycled policy can be an effective tool in providing the leadership needed to support recycled materials markets within free market principles.

Attached is a summary of the Department's policies and procedures for purchasing recycled content products as outlined in the Department's Administrative Manual. Also attached are several suggestions to increase the use of recycled materials and their purchase within the government procurement system statewide.

Careful purchasing decisions can yield a positive influence on the environment by reducing the amount of waste generated and saving energy. The principle of best product for best price can be maintained with recycled content products. Through strong specification development and manufacture of innovative products that meet user demands for quality at a reasonable price, increased recycled content procurement can be achieved.

If you need further information or have any questions, please contact Dana Stone of my staff at (916) 323-3836.



John Ellis
Assistant Director

Attachment

cc: Lawrence J. Goldzband, Director

Highlights of Existing Procurement Policies and Guidelines

- The Department has a contract to purchase general office supplies from "Office Depot". Recycled content products (RCPs) are specified in the catalogue and the Department orders these products whenever possible.
- The Department purchases recycled content paper for copiers.
- The Department has a contract with "Laser Company" for purchasing recycled laser toner cartridges. The Department also purchases "Green Disks" for computer use.
- All applicants for contract and grant funds are notified and contain the Department's procurement goals. A concerted effort must be made by contractors and grantees to meet or exceed these goals when making purchases with grant or contract funding.
- Successful vendors who participate in the competitive bidding process must complete a Recycled Content Certification Form, which discloses the recycled content of the products offered for sale.
- Price preferences are applied to the purchases of RCPs as specified in the Department's Administrative Manual (Section 47003).

Suggestions to Improve State Agency Specification Development and Procurement Practices

- Adopt an existing life-cycle cost assessment method for purchases of recycled versus non-recycled products and publicize the results.
- Learn what users need and the materials that they typically buy. Solicit input from people throughout the organization (not just purchasing staff). Find out why certain items are not being purchased and conduct research to remove any limitation(s). Find out which areas already have a demonstrated RCP interest and support the interest that is already there.
- Adopt reasonable goals and scheduled timelines for evaluating products. Personnel that actually work with the products should be the key evaluators, specifying which products to use and how to use them. Pilot projects should be implemented for all innovative products.

- Publicize the results of trials and evaluations of recycled content products. Start formal or informal information networks or teams to share good and bad experiences with product use. Expand this network to include private sector corporations for better product information and outreach.
- Expand current law to include other recycled content products [e.g. clothing made from recycled PET for uniforms, prison wear, Caltrans vests etc.].
- Consider revising current law to provide tougher penalties and sanctions for non-compliance with procurement guidelines found in existing law.
- Continuous large-scale training of purchasing officers and staff at both the state and local level (using workshops, videos, in-service training classes) is needed similar to the original State Agency Buy Recycled Advocacy (SABRA) Campaign.
- Each Agency's administrative manual should include a buy-recycled policy, which is also filed with CIWMB.
- State agency contracts and grants language should refer to the Agency's policy and require contractors and grantees to make a reasonable effort to purchase RCPs.
- Use incentives and recognize those that are increasing their procurement efforts. A Governor's Office or Legislative award could stimulate interest and participation.
- Simplify recycled product recordkeeping. Don't require employees to keep separate or complex records on recycled content purchases.
- Increase promotion of RCP resources to purchasing officers and all agency staff through the Internet and/or continuous specialized training teams referenced above.

ADMINISTRATIVE MANUAL

DATE: 12/27/95 SECTION: 4700

GENERAL POLICY

47000

- o It is the policy of the Department of Conservation to optimize the departmental procurement of recycled content products. Fitness and quality being equal, the Department shall buy recycled content products whenever the cost is the same or lower than non-recycled content products.
- o Department publications shall be printed on recycled content paper and/or recyclable paper.
- o The Department shall apply approved price preferences to all purchases of recycled content products when they compete with non-recycled products.
- o The Department shall purchase goods which may be recycled or reused rather than discarded.
- o The Department shall strive to attain the following AB 11 purchasing goals.

AB 11 RECYCLED CONTENT PRODUCT BUYING GOALS

	Current Goal	1996	1998
Paper Products	40% of \$ spent	50% of \$ spent	50%
Fine Printing and Writing Paper	15% of reams bought	25% of reams bought	25%
Overall Purchasing goals *	NA	20% of \$ spent	30%

*For each of these product categories: compost, glass, plastic, oil, and solvents, paint, and tires.

AUTHORITY

47001

- o Public Contract Code Sections 12162, 12205, 12159, and 12305.5

RESPONSIBILITIES

47002

DIRECTOR

1. As determined by the Director, the Department shall adopt a specific buying plan to meet its current purchasing goals.

ASSISTANT DIRECTOR FOR ADMINISTRATION

1. The Assistant Director for Administration shall assign a Department Recycled Content Product Procurement Coordinator.
2. The Assistant Director shall report to the Director quarterly on the progress of recycled content product purchasing.

37-46

ADMINISTRATIVE MANUAL

DATE: 12/27/95 SECTION: 47000-03

RESPONSIBILITIES - (Continued)

47000

BUYERS

1. All Department Invitations for Bid (IFBs) for purchases, and contracts with deliverables, shall include a Recycled Content Certification form which requires competing manufacturers to disclose the recycled content of any product offered for sale. Completion of the form (DOR2-95-17) by competing vendors is optional, but winning vendors must complete this form. No certification form is required for purchases from Material Services or Statewide Contracts.
2. Buyers shall apply (1) approved price preferences and (2) minimum recycled content standards to all delegated purchases of recycled content products in the categories listed in the Recycled Content Product Price Preferences (Section 47003, attached). Buyers shall report price preference data to Business Services.
3. Buyers shall report purchases to Business Services by (1) marking each invoice, SPO (sub purchase order), or Form 65 clearly with "Recycled Content Product" or "RCP" and (2) attaching the original, completed Recycled Content Certification form (DOR 2-95-17).
4. Buyers may sponsor recycled content product-only competitive bids when recycled content products are not available through Material Services or Statewide Contracts.
5. If price presents a barrier to purchasing recycled content products, buyers may purchase fewer products to stay within budget, as long as department needs are met.
6. Prior to competitive bidding on delegated purchases and contract with deliveries, buyers shall ensure that specifications referenced or prepared by knowledgeable staff shall allow recycled content products to compete fairly. Departmental use of existing State or federal specifications for recycled content products is strongly advised.
7. Department staff shall purchase (and return for recycling) remanufactured cartridges, where available, for printers (e.g., laserjet) and photocopying machines.

Attachment: Recycled Content Product Price Preferences

ADMINISTRATIVE MANUAL

DATE: 12/27/95 SECTION: 47000-33

RESPONSIBILITIES - (Continued)

47000-33

BUYERS

1. All Department Invitations for Bid (IFBs) for purchases, and contracts with deliverables, shall include a Recycled Content Certification form which requires competing manufacturers to disclose the recycled content of any product offered for sale. Completion of the form (DOR2-95-17) by competing vendors is optional, but winning vendors must complete this form. No certification form is required for purchases from Material Services or Statewide Contracts.
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3. Buyers shall report purchases to Business Services by (1) marking each invoice, SPO (sub purchase order), or Form 65 clearly with "Recycled Content Product" or "RCP" and (2) attaching the original completed Recycled Content Certification form (DOR 2-95-17).
4. Buyers may sponsor recycled content product-only competitive bids when recycled content products are not available through Material Services or Statewide Contracts.
5. If price presents a barrier to purchasing recycled content products, buyers may purchase fewer products to stay within budget, as long as department needs are met.
6. Prior to competitive bidding on delegated purchases and contract with deliveries, buyers shall ensure that specifications referenced or prepared by knowledgeable staff shall allow recycled content products to compete fairly. Departmental use of existing State or federal specifications for recycled content products is strongly advised.
7. Department staff shall purchase (and return for recycling) remanufactured cartridges, where available, for printers (e.g., laserjet) and photocopying machines.

Attachment: Recycled Content Product Price Preferences

RECYCLED PRODUCT PRICE PREFERENCES

47003

5	tire derived rubber products	(50PC)	20% in 1996 30% in 1998	none	no
5	rerefined automotive lubricants	(70)	20% in 1996 30% in 1998	1/1/97	yes
5	recycled antifreeze fluid	(70)	20% in 1996 30% in 1998	1/1/97	yes
5	recycled solvents	(70)	20% in 1996 30% in 1998	1/1/97	yes
5	recycled paints	(50PC)	20% in 1996 30% in 1998	1/1/97	yes
5	paper janitorial supplies	(50/10)	40% in 1995 50% in 1996	1/1/2001	no
	paper, fine printing & writing, sold in reams	(20PC)	15% of reams in 1995, 25% of reams in 1996	1/1/2001	no
10	paper, non-janitorial, not sold in reams; excluding newsprint	(50/20)	40% in 1995 50% in 1996	1/1/2001	no
10	compost and co-compost	(50/10)	20% in 1996 30% in 1998	1/1/2001	yes
10	plastic products excluding trash bags & rigid plastic containers	(50/10)	20% in 1996 30% in 1998	1/1/2001	yes
0	glass products	(10)	20% in 1996 30% in 1998	1/1/2001	no

data in parentheses refers to the required minimum recycled content a product must contain in order to qualify as a recycled product in each category and/or qualify for a price preference, if available (see last column and sunset date).

(50 PC) means that the product must contain a minimum of 50 percent postconsumer material.

(50/10) means that the product must meet the statutory definition in Public Contract Code 12200(a): "Recycled product" means all materials, goods, and supplies, no less than 50 percent of the total weight of which consists of secondary plus postconsumer waste, waste with not less than 10 percent of its total weight consisting of postconsumer waste.

means postconsumer material, defined in statute as a finished material which would normally be disposed of as a solid waste, having completed its cycle as a consumer item. For example, empty soda bottles, returned to the recycler after people have drank the contents, are postconsumer material.

M e m o r a n d u m

Date: April 28, 1998

To: Jerry Hart
California Intergrated Waste Management Board
Organics & Resource Efficiency Branch
8800 Cal Center Drive
Sacramento, CA 95826

From: Personnel & Support Services Branch
1600 Ninth Street, Room 340
Sacramento, CA 98514

Subject: CIWMB Request for Assistance to Develop Recommendations to Increase Recycled Product Procurement

In the letter to Clifford Allenby, Director, Department of Developmental Services (DDS), the Board seeks assistance in developing recommendations to increase the purchase and use of recycled materials by DDS. Following is the Department's response to the items listed.

1. DDS follows state regulations when purchasing materials, supplies, and other items made of recycled materials.
2. DDS does not have its own written procedures regarding development and inclusion of recycled material in products, but follows state requirements.
3. The Customer Support Section believes that the State of California should develop a process similar to California Multiple Award Schedule, or contract with vendors, for items that include recycled materials such as office supplies and other paper items. The State would then be able to purchase in quantities, thereby, reducing the cost for recycled materials. The reduced price would give state agencies more incentive to purchase recycled materials.

If you have any questions, or would like more information, please call Howard Kiefer at 654-1503.



LOU O'NEAL, Chief
Personnel and Support Services Branch

c. Cliff Allenby
Paul D. Carleton

The percentage of recycled paper purchased by the department for the 97/98FY was 87%. This information was provided to the Waste Management Board

For commodity purchases program units are encouraged to purchase recycled products when available..

Suggestions to increase buying recycled products:

- Set stricter departmental guidelines, i.e., departments must only purchase products with recycled content, if that particular recycled item is not available, then a nonrecycled product may be purchased
- Revise bid specifications to increase percentage of recycled content; revise policies and procedures accordingly; notify vendors of the new policies and procedures set and make vendors aware that we want to buy recycled products
- Promote initiatives, i.e., reward departments with the highest percentage of recycled products purchases
- Individual departments take tallies of which division/unit purchased the most recycled products
- Give recognition--publicize the winners and the progress of recycling initiatives in the Sacto Bee or use other media means
- As a state requirement, departments must submit an annual report which includes data on purchases of recycled/nonrecycled and environmentally preferable products; the report must also show the status of policy implementation
- Ensure that all vendor catalogs have a section identifying recycled products; if a paper product, an imprint identifying the recycled content
- Organize a team of staff and management to:
 - a. Evaluate and gather recycled product data to determine total amount purchased
 - b. Get acquainted with the problems and solutions available
 - c. Develop written office policy on waste reduction, reuse, recycling and procurement of recycled products (Buy Recycled)
 - d. Evaluate and expand new ideas; set goals
 - e. Initiate contests between departments that buy the most recycled products
- Make people aware of potential savings and the rewarding effects to the environment that buying recycled products bring

DEPARTMENT OF CORRECTIONS

P.O. Box 942883

Sacramento, CA 94283-0001



April 27, 1998

Mr. Jerry Hart
California Integrated Waste Management Board
Organics & Resource Efficiency Branch
8800 Cal Center Drive
Sacramento, CA 95826

Dear Mr. Hart:

This is in response to your letter to Mr. C. A. Terhune, Director, Department of Corrections (CDC), dated March 26, 1998, requesting assistance to develop recommendations to increase recycled product procurements by state agencies.

Our suggestions to increase recycled product procurements are as follows:

1. Regulations and procedures of state agencies regarding purchasing materials, supplies, equipment, and other items made of recycled materials.
 - If a product has any recycled product content, it should count towards being a recycled product.
 - Do not require state agencies to have vendors and contractors certify in writing that their products contain recycled material every time a purchase is made. Instead, require vendors and contractors to register their recycled products with one state agency and have the registration available on the Internet for access by all state agencies.
 - Simplify state agency annual reporting requirements. Remove the requirement to project annual goals for recycled products.
2. Regulations and procedures of state agencies regarding specification development and the inclusion of recycled materials in those specification.
 - CDC has no specific suggestions since we have very few specifications specifically for CDC's use. We do use specifications developed by the Department of General Services, Procurement Division.

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Mr. Jerry Hart

Page 2

3. Any steps state agencies, both collectively and individually, could take to increase their use of recycled materials or purchase products made from recycled materials, and potential effects on the recycled materials market.

- The Buy Recycled Products Task Force is a good forum for manufacturer's and seller's of recycled products to display their products.
- At the present time, only purchasing staff have been involved in the Buy Recycled Campaign. Staff who actually will be using the recycled products should be involved (i.e. painters, plumbers, carpenters, chief of plants, gardeners, vehicle maintenance, janitorial, and office staff) in information sharing and education from the vendors on the merits of their products.

If any additional information is needed, please contact Ann Ford, Business Service Officer III, at 323-5469.

Sincerely,


JACK M. PEYTON, Chief
Business Services Section

cc: R. Burrows
J. Buckman

721 Capitol Mall

Sacramento

CA 95814

Phone: (916) 657-4766

Fax: (916) 657-4975

DELAINE EASTIN

State Superintendent of Public Instruction

May 5, 1998

Jerry Hart
CIWMB
Organics & Resource Efficiency Branch
8800 Cal Center Drive
Sacramento, CA 95826

Dear Mr. Hart:

Thank you for requesting recommendations from the California Department of Education to increase recycled product procurement by state agencies.

Per your request, enclosed are our recommendations on this issue on a 3.5 diskette formatted in Microsoft Word. If you have any questions, please call Sam Walton, Manager of the Operations Services Office at (916) 322-3001.

Sincerely,



DELAINE EASTIN
State Superintendent of Public Instruction

DE:ggp
Enclosures

37-54

The percentage of recycled paper purchased by the department for the 97/98FY was 87%. This information was provided to the Waste Management Board

For commodity purchases program units are encouraged to purchase recycled products when available..

Suggestions to increase buying recycled products:

- Set stricter departmental guidelines, i.e., departments must only purchase products with recycled content, if that particular recycled item is not available, then a nonrecycled product may be purchased
- Revise bid specifications to increase percentage of recycled content; revise policies and procedures accordingly; notify vendors of the new policies and procedures set and make vendors aware that we want to buy recycled products
- Promote initiatives, i.e., reward departments with the highest percentage of recycled products purchases
- Individual departments take tallies of which division/unit purchased the most recycled products
- Give recognition--publicize the winners and the progress of recycling initiatives in the Sacto Bee or use other media means
- As a state requirement, departments must submit an annual report which includes data on purchases of recycled/nonrecycled and environmentally preferable products; the report must also show the status of policy implementation
- Ensure that all vendor catalogs have a section identifying recycled products; if a paper product, an imprint identifying the recycled content
- Organize a team of staff and management to:
 - a. Evaluate and gather recycled product data to determine total amount purchased
 - b. Get acquainted with the problems and solutions available
 - c. Develop written office policy on waste reduction, reuse, recycling and procurement of recycled products (Buy Recycled)
 - d. Evaluate and expand new ideas; set goals
 - e. Initiate contests between departments that buy the most recycled products
- Make people aware of potential savings and the rewarding effects to the environment that buying recycled products bring

DEPARTMENT OF FORESTRY AND FIRE PROTECTION

P.O. Box 944246
SACRAMENTO, CA 94244-2460



May 6, 1998

In order to comply with the state mandated requirements regarding the State Agency Buy Recycled Campaign (SABRC), the California Department of Forestry and Fire Protection (CDF) has implemented the following procedures:

1. The Department currently is promoting education for departmental staff on the state mandates regarding the SABRC. Education is being presented through periodic e-mails, departmental training conferences and updates regarding task force meetings. The primary focus of the training has been toward those employees involved in purchasing and finance.
2. Tracking purchases of recycled content products is being facilitated through the departmental accounting process. By creating specific accounting codes that are used solely for recycled content product purchases, the department will have a clearer picture of those categories meeting the mandates and those categories that require improvement. A report will be generated showing categories where purchases of recycled content products are weak and need improvement.
3. Ongoing meetings of the SABRC Task Force, begun in February of this year, would be an excellent way for agencies to increase their use and purchase of recycled materials and products. The ability to network with other agencies concerning both positive and negative results of purchasing recycled content products will benefit everyone involved. Task force member Toni Frederickson (CDF Business Services staff) has attended SABRC meetings and gleaned valuable information applicable to the department's continuing success with the program.

If you have questions regarding these comments please contact
Toni Frederickson, CDF, Business Services Office, 1021 'O' Street, Sacramento,
California, 95814, (916) 323-7119.



MEMORANDUM

Date: April 30, 1998

To: Caren Trgovcich, Deputy Director
Integrated Waste Management Board

From: Department of General Services

Subject: BUY RECYCLED CONTENT PRODUCTS RECOMMENDATIONS

The Department of General Services (DGS) is responding to your letter of March 26, 1998. Caren, let me assure you that we are committed to assisting the Integrated Waste Management Board in the diversion of the waste stream and in the purchase of recycled content products. I have distributed a Management Memo (97-11) instructing my department to meet or exceed the minimum purchase requirements and have taken the liberty of requesting other departments to follow my lead.

With regard to the second item in your letter, we would like to be involved in your efforts regarding specification development and the inclusion of recycled materials in those specifications. As one of the state's largest procurement and real estate agencies, we have considerable experience in developing specifications and procurements in general. We believe we may be able to provide you with valuable expertise in the development of your recommendations regarding regulations and specification development for the inclusion of recycled materials in a variety of settings.

In reference to the third item in your letter, actions that we feel could be implemented to further the purchase and use of recycled content products follow:

- Assign a responsible person in each purchasing unit to implement the program. The DGS Procurement Division believes that the "Buy Recycled Content Products" program is so important that we have assigned a full-time position to the task of promoting the program.
- Join our task force. The Procurement Division recently put together a task force with other state agencies to promote collectively the use of, and solve problems associated with the purchase of, recycled content products. It is expected that the task force will address problems ranging from reporting issues to solving product specifications to monitoring poor quality upon delivery.
- Make it a statewide policy to purchase recycled paper as the norm rather than the exception. Our department is currently pursuing establishing a statewide contract for recycled paper only that would be available to both state and local agencies.

This contract would be different in that it would follow the cost of paper as the market moves on a daily basis.

- Make it a statewide policy to encourage the purchase of recycled paint.
- Conduct more demonstration projects to show that recycled content products are similar or equal in quality to their virgin product counterparts. A good example for the Integrated Waste Management Board to consider is the paving for the parking lot at 4949 Broadway in Sacramento.
- Target funds specifically to support the purchase of recycled content products.
- Encourage communication from top management to the user and purchaser that "Our agency is committed to the purchase of recycled content products even when those products cost more. We will tighten our collective belts and purchase recycled content products." Without the "buy-in" and support of top management, the "Buy Recycled Content Products" program is destined to mediocrity. However, this communication would not be intended to discourage competition among recycle product providers.

If you have any further questions concerning this response or if we can assist you in any other way, please contact Patrick Bailey, Procurement Division, at (916) 323-7666.



PETER G. STAMISON, Director
Department of General Services

PGS:PB:kaz

cc: Happy Chastain, Deputy Secretary—Legislation, State and Consumer Services
Agency

Karen Neuwald, Assistant Director—Legislation, DGS

Chuck Grady, Deputy Director, Procurement Division, DGS

Gaylord Moulds, Procurement Division, DGS

Patrick Bailey, Procurement Division, DGS

✓ Jerry Hart, Integrated Waste Management Board

DEPARTMENT OF HEALTH SERVICES

714/744 P STREET, ROOM 1253

P. O. BOX 942732

SACRAMENTO, CALIFORNIA 94234-7320

(916) 657-3054



April 22, 1998

Mr. Jerry Hart
California Integrated Waste
Management Board
Organics & Resource Efficiency Branch
8800 Cal Center Drive
Sacramento, CA 95826

Dear Mr. Hart:

This is in response to Ms. Caren Trgovcich's letter of March 26, 1998 to Ms. S. Kimberly Belshé. Her letter was forwarded to me for response.

The Department of Health Services (DHS) has a decentralized purchasing process administered by the Administration Division's Program Support Branch (PSB); it does not enter into its own contracts with vendors for supplies and goods. As a result, we have few options for achieving a significant increase in the quantity of recycled content merchandise we purchase. A directory of vendors who sell recycled content products, divided into the various commodity categories specified by your Board, would be a useful tool for all state departments in locating suppliers with whom to do business.

DHS purchases its largest portion of recycled goods through the master contracts established by the Department of General Service's (DGS) Procurement Division. We recommend that the DGS Procurement Division increase the number of master contracts containing recycled content products so that DHS and all other state departments could thereby increase their utilization of recycled content products.

If you have any additional questions, please contact Mr. Edward E. Stahlberg, Chief, PSB, at (916) 322-4261.

Sincerely,

A handwritten signature in cursive script, reading 'Stephen W. Kessler'.

Stephen W. Kessler
Deputy Director
Administration

DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT

OFFICE OF THE DIRECTOR

1800 THIRD STREET, Suite 450
P.O BOX 952051
SACRAMENTO, CA 94252-2051
(916) 445-4775 FAX (916) 323-2815



April 23, 1998

Jerry Hart
CIWMB
Organics & Resource Efficiency Branch
8800 Cal Center Drive
Sacramento, California 95826

Dear Mr. Hart:

The Department Of Housing And Community Development (HCD) participates in the State Agency Buy Recycled Campaign (SABRC), and has met the specified procurement goals for recycled content products (RCP).

We have encountered some resistance to the use of recycled products as they are perceived to be inferior, damaging to equipment and are the cause of less than desirable finished work.

HCD is currently considering several actions to increase the acceptance of recycled products, such as use for trial periods with user input on quality and visible management support and encouragement. Also under consideration is the mandatory use of basic products (copy paper, envelopes, etc.) that have been proven to be satisfactory.

If you need additional information, please contact Frank Fenner, our Recycle Coordinator at (916) 445-8782.

Sincerely,

A handwritten signature in dark ink, appearing to read "Richard Mallory". The signature is fluid and cursive, with a large loop at the end.

Richard Mallory
Director

37-60



1300 I STREET, SUITE 125
P.O. BOX 944255
SACRAMENTO, CA 94244-2550
Public: Area Code/Public Number or "Ask"

Facsimile: (916) 324-5033
(916) 324-5454

April 21, 1998

Mr. Jerry Hart
CIWMB
Organics & Resource Efficiency Branch
Integrated Waste Management Board
8800 Cal Center Drive
Sacramento, CA 95826

RE: Recommendations for Increased Recycled Product Procurement

Dear Mr. Hart:

Thank you for the opportunity to provide recommendations on increasing the recycled product procurement by state agencies. The Department of Justice (DOJ) is committed to the use of recycled products, and is aware of the increased role these products have in the marketplace. In response to your request of March 26, 1998, DOJ offers the following suggestions:

1. The California Integrated Waste Management Board (Board) should create the report due to the Governor and Legislature with the help of the Department of General Services (DGS), Procurement Division. DGS is the buyer, builder, and developer of contract specifications for the State. Their input is crucial for an effective statewide program.
2. Specific partnerships could be developed between DGS and private industry for both the production and uses of products made from recycled materials. DGS should redirect resources previously dedicated to its Minority and Women Business Enterprise program to help the board achieve its goals, along with research and development of new recycled product opportunities. As you know, DOJ has been attempting to get a parking lot built at our Broadway facility that is constructed of recycled tires. DGS, Fleet Administration is a large user of tires, and would be a valuable source of recycled materials for the production of rubberized asphalt. Likewise, the enormous amount of paper waste that state agencies generate could be used for construction projects undertaken by DGS. Properly treated, this waste paper could be turned into insulation, furniture, or a host of other products.

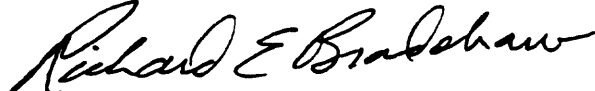
37-61

3. The State could get involved in the production of alternative fuel production by generating electricity with the waste generated by agencies. Perhaps facilities in the California Prison System could generate, use, and provide extra electrical energy to the communities in which they reside.
4. Further legislative mandates regarding the use of recycled products are possible as the varied types and cost effectiveness of products increase. Emphasis should remain on increased product development and availability rather than increased reporting requirements. DOJ complies with the reporting guidelines of the State Agency Buy Recycled Campaign. We have more than met procurement mandates in the areas of Fine Printing, Writing Paper and Paper Products. The campaign, however, emphasizes reporting requirements rather than the specific ways that agencies can reduce the amount of solid waste going to disposal facilities.
5. Increase the requirements on our statewide contract office supply vendor, Office Depot, to include, highlight, and market products made from recycled materials. Future contracts should be developed using these requirements.
6. Increase research efforts at making the paperless office environment at least a partial reality.

I hope these comments can be of some use to your agency. If you have any questions, please contact the manager of DOJ's Contracts and Purchasing Unit, Bill Holtz, at 324-5015.

Sincerely,

DANIEL E. LUNGREN
Attorney General


RICHARD E. BRADSHAW
Director, Administrative Services Division

cc: Caren Trgovcich, Deputy Director

ATASCADERO STATE HOSPITAL

DEPARTMENT OF MENTAL HEALTH

P.O. BOX 7001

ATASCADERO, CA 93423-7001

(805) 468-2000

CALNET 690-2000

TDD (805) 468-2009



April 22, 1998

Mr. Jerry Hart, Project Manager
California Integrated Waste Management Board
Organics & Resource Efficiency Branch
8800 Cal Center Drive
Sacramento, CA 95826

Dear Mr. Hart:

Re: Recommendations to increase recycled product procurement

This is in response to your letter of 03-26-98. Here are the details you requested.

1. Regulations and procedures of state agencies regarding purchasing materials, supplies, equipment and other items made of recycled materials.

The regulations used are AB4 and AB11, which outline the specific quantities of recycled product procurement, procurement goals, certification, and price preferences are also outlined. Public Contract Code Sections 12162, 12205, 12310, 12159, and 12305.5 are references used for procurement of recycled products.

Procedures that are used in the procurement of recycled content include memos sent to the various department managers regarding current and future percentage mandates. The department managers and their staff who order are asked to comply with these mandates. If a department is not using recycled content products, a memo is required from the department manager stating specific reasons why a non-recycled product was procured. Only memos justifying the health and safety of individuals or State property are accepted; with few exceptions.

2. Regulations and procedures of state agencies regarding specification development and the inclusion of recycled materials in those specifications.

Regulations' Public Contract Code Section 12205(a)(1), 12205(a)(2), and 12205(c)(1) refer to the obligation of contractors and State agencies to buy recycled content products.

37-63

Recycled Content Certifications are sent to all suppliers who we buy products from in the recycled product categories, along with a letter explaining what we need for our records. Certifications are received and kept in binders so that verification can be made to ensure suppliers are not sending the same certifications for all products. A copy of the purchase orders used to compile the yearly reports are kept on file.

3. Any steps state agencies, both collectively and individually, could take to increase their use of recycled materials or purchase products made from recycled materials, and potential effects on the recycled materials markets.

Recommendations are that State agencies work together to meet recycling goals. There has been a poor response, from other State agencies, for returning certifications for recycled products. We are also mandated to purchase certain supplies from Prison Industry Authority. When asked about recycled content they reported no recycled content in the products we purchased (steel and plastic products). This information was sent in a letter to you dated September 16, 1997. It would be very helpful if Prison Industry Authority send a flyer with what products they sell that have recycled content. Many suppliers have a specific recycled product section in their catalogs (specifically office supplies) which is very helpful.

When General Services, Office of Procurement, is preparing to place a contract out for bid, recycled content of products could be required (for specific items) and eliminate hours of work at each agency each year.

I hope this information is useful to your study. If possible, we would be interested in receiving a copy of your final report, to see how Atascadero State Hospital compares to other agencies.

Sincerely yours,



Linda C. Wilkes
Hospital Administrator

37-64

Memorandum

Date : May 1, 1998

To : Jerry Hart, Project Manager, SABRC
Organics & Resource Efficiency Branch
California Integrated Waste Management Board
8800 Cal Center Drive
Sacramento, CA 95826

From : Administrative Services Division

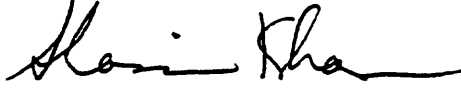
Subject : Recycle Recommendations

The Department of Motor Vehicles has reviewed your request for input regarding the Buy Recycled Program. After careful analysis of the legislation and regulations pertaining to the state's program to increase the market for recycled products, our comments are as follows:

1. The current co-sponsorship of the program by the Department of General Services, and the California Integrated Waste Management Board, has in the past led to confusion in regard to policy and procedural changes in the state's procurement rules. A central office for the dissemination of official policy and procedural changes would be an asset in this area.
2. The creation of too specific procedures and policies, regarding specification development, limits our agency from purchasing products created by new and alternative forms of recycling technology. The general goals for percentages of recycled material, as prescribed in Chapter 12150 of the Public Contract Code, should be sufficient to guarantee that the state's policies regarding recycling are met. General content specifications should be the rule.
3. The current program is sufficient to meet both the spirit and letter of the requirements set forth by Chapter 12150 of the Public Contract Code. Costs of recycled products have lowered since the inception of this policy in 1989, the marketplace is changing on its own. Recycled products are achieving higher and higher market share annually, allowing recycled product vendors to grow and flourish in our current economy. Further mandates and restrictions may be counter productive to the overall operations of individual agencies.

Jerry Hart
May 1, 1998
Page 2

The Department of Motor Vehicles appreciates being included in the effort to improve areas within the Buy Recycled Program. If you have any further questions, please contact Paul R. Smith, Procurement Officer, at 657-6970.



SHAMIM KHAN
Deputy Director

37-666

DEPARTMENT OF PARKS AND RECREATION

P.O. BOX 942896

SACRAMENTO 94296-0001

(916) 653-0528



MAY 01 1998

Mr. Jerry Hart
Integrated Waste Management Board
Organics and Resource Efficiency Branch
8800 Cal Center Drive
Sacramento, California 95826

Dear Mr. Hart:

Thank you for the opportunity to respond with our comments regarding increasing recycled product procurement by state agencies.

To date, our department has accomplished several steps toward increased recycled-content product procurement. We have updated our administrative manuals, we are requiring the required annual reporting of progress in buying recycled-content goods, we have developed an Excel-based computer-friendly form for the certification form for easy access by purchasers, and we have developed an on-site training program that has been given to over 100 purchasers. I have enclosed the program handouts for you.

We would like to offer three suggestions for improving the process:

1. The certification process requires vendors to complete a form listing the exact percentage of recycled material contained in each product produced. Vendors are reluctant to comply with its requirements. It is our opinion that the reluctance is caused by the concept of certifying to products whose manufacture is out of the control of the certifying party.
2. Products purchased from State Contracts, Price Schedules, CMAS, PIA, and Master Purchase Agreements should not need certification. The recycled content of these items could be listed as part of the item description or specification.

37-67

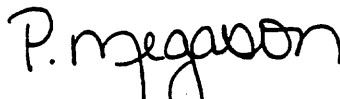
Mr. Jerry Hart
Page Two

3. Products procured through the use of the CAL-Card could be tracked automatically. Rocky Mountain Bank claimed that this could be done when they were bidding for the CAL-Card contract.

Current regulations and procedures seem sufficient from our point of view. However, the department is in a unique position because of the far-flung nature of many of our units. Some of our smaller or more isolated parks or offices may not have a broad selection of recycled materials because they are forced to procure from a limited number of local suppliers.

Thank you again for the opportunity to comment. I hope these suggestions are helpful. If you need any additional information, please contact Dan Hammond, Business Services Manager, at (916) 653-6592.

Sincerely,



Patricia J. Megason
Interim Director

Enclosure

37-68